

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,
Plaintiffs

vs.

CHRIS MEALEY ELECTRICAL, INC.,
Defendant

and

FIRST TRADE UNION BANK and FLEET BANK,
Trustees

C.A. No. 04-12209 EFH

AFFIDAVIT OF SEAN E. DONLAN

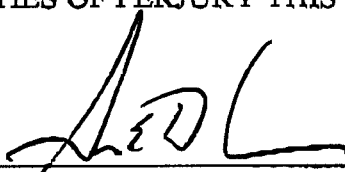
1. My name is Sean E. Donlan. I am a vice president with the firm of Vitale, Caturano & Company, Ltd. My firm was retained by Plaintiffs International Brotherhood of Electrical Workers Local 103 Trust Funds in March, 2007 to audit the payroll records of

Defendant Chris Mealey Electrical, Inc. ("Mealey") for the period April, 2004 through March, 2007 to determine whether Mealey owes any fringe benefit contributions to the Funds.

2. I sent a letter to Mealey on April 13, 2007 via certified and first class mail, asking him to prepare and send to the firm's attention, no later than April 27, 2007, a series of relevant payroll records for the period April 1, 2004 through March 31, 2007. A true and accurate copy of my April 13, 2007 letter is attached hereto as Exhibit 1. The return receipt from the delivery of my April 13, 2007 certified letter demonstrates that it was signed for by a representative of Mealey on April 16, 2007.

3. To date, this firm has neither received any of the requested documents nor been contacted by Mealey.

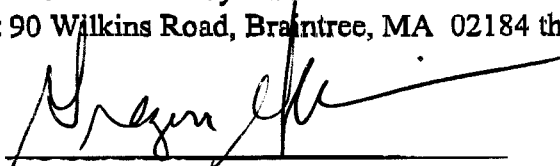
SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 7th DAY OF MAY, 2007.



Sean E. Donlan

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Affidavit has been served by certified and first class mail upon defendant Chris Mealey Electrical, Inc. at 90 Wilkins Road, Braintree, MA 02184 this 15th day of May, 2007.



Gregory A. Geiman, Esquire